

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA

DONNA CURLING, ET AL.,

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, ET AL.,

*Defendants.*

No. 1:17-CV-2989-AT

RESPONSE

The U.S. Cybersecurity and Infrastructure Security Agency (CISA) respectfully submits this response to the Court’s June 24, 2022 order, ECF No. 1406, directing “CISA to submit privileged and confidential redaction recommendations relative to Dr. Halderman’s report by **July 22, 2022.**”

CISA previously informed the Court of its concern that dissemination of the report, even in redacted form, while the coordinated vulnerability disclosure (CVD) process was ongoing could pose a threat to election security. *See* ECF No. 1314. Specifically, CISA noted that premature disclosure, before potential vulnerabilities could be addressed through appropriate mitigation actions, could increase the risk that malicious actors could exploit any vulnerabilities and threaten election security, and that, in order to best promote the security of critical voting infrastructure, any vulnerabilities should be disclosed at the conclusion of the CVD process. We further informed the Court that CISA supports public disclosure, with maximum appropriate transparency, of information about vulnerabilities and their associated mitigations after those mitigation measures have been developed and applied through the CVD process. *See id.*

Accordingly, CISA publicly disclosed certain information about potential vulnerabilities and associated mitigations on June 3, 2022. *See* ECF No. 1391. CISA also notes that, after conclusion of the CVD process, it is common for researchers to independently release their reports publicly.

It now has been 49 days since the public release of CISA's advisory, which has allowed affected end users additional time to implement the recommended mitigation measures contained in CISA's public advisory. In light of these facts, CISA respectfully submits that Plaintiffs' most-recent proposed redactions appropriately manage the risk to election security while advancing security through transparency. CISA thus does not propose additional redactions for the Court to consider.

Respectfully submitted,

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